



**U.S. FOOD & DRUG**  
ADMINISTRATION

To: Scott Smith  
Assistant United States Attorney  
United States Attorney's Office  
Western District of Tennessee

From: Hannah E. Godschalk, M.S.  
Chemist, Organic Branch  
National Forensic Chemistry Center  
U.S. Food and Drug Administration

Subject: Statement of Testimony  
*United States v. Kumar*

Date: June 3, 2025

1. The following notice of testimony is provided as required by Federal Rule of Criminal Procedure 16(a)(1)(G). This statement (4 pages) and the referenced documents taken collectively are intended to provide a complete statement of my opinions and the bases supporting the opinions. However, they are not an exhaustive or complete recitation of testimony that I may offer. In addition, I may offer opinions in response to questions posed during a hearing or trial.
2. My name is Hannah E. Godschalk. I am employed as a chemist in the Trace Examination Section in the Organic Laboratory Branch of the National Forensic Chemistry Center (NFCC) at the U.S. Food and Drug Administration (FDA). I have been in this position since September 2023. Prior to joining the NFCC, I worked as a DNA Analyst for the West Virginia State Police Forensic Laboratory (from May 2015 to September 2023) and as an Adjunct Faculty Member for the Marshall University Chemistry Department (January 2015 through May 2015).
3. I have been asked by the United States to provide testimony in this matter pertaining to the analyses and my interpretation of those results as set forth in the Case/Sample Summary Report(s) dated August 8, 2024 and March 26, 2025. The manner and process by which I performed the analyses were, to the best of

my knowledge, in accordance with all NFCC technical and equipment Standard Operating Procedures (SOPs) in effect at the time of the analyses.

4. The below statements include a more specific summary of the substantive testimony I anticipate providing during direct examination at trial.

a. Items 1A, 1B, 1C, 2A, 2B, 2C, 3A, 3B, 4A, 4B, and 5A (FACTS # 1259234) were examined for the presence of foreign material using stereoscopic light microscopy (SLM) and an alternate light source (ALS) (see Table 1 below). I will explain why these methods were chosen, including the ALS wavelength used. Items 1B, 1C, and 3B (FACTS # 1259234) were compared to the control items submitted (FACTS # 1262737). Items 1A, 1B, 1C, 1D, 1E, 2A, 2B, 3A, 3B, 3C, 3D, 4A, 5A, 6A, and 6B (FACTS # 1286249) were examined for the presence of foreign material using SLM and the ALS (see Table 2 below).

b. I will testify, in my expert opinion, to the presence of foreign material on the items submitted and to whether select items are consistent with the control items provided by the Special Agent.

c. I will testify, in my expert opinion, that Items 1B, 1C, and 3B (FACTS # 1259234) are not consistent with the sealed control Items 1A and 2A (FACTS # 1262737).

Table 1.

Item	Foreign material present	Comments
1A	Yes	Unknown material on handle visible using ALS
1B	Yes	Unknown fiber-like particle and debris observed on camera tip, plastic appears cloudy, liquid present in tube
1C	Yes	Unknown fiber-like particle and debris observed on camera tip, plastic tip appears cloudy, liquid present in tube
2A	Yes	Unknown red-brown debris observed in claw mechanism, unknown material on handle visible using ALS
2B	Yes	Unknown red-brown debris observed in tip mechanism, unknown material on wire neck visible using ALS
2C	Yes	Unknown debris observed on black attachment, unknown material on handle visible using ALS

3A	Yes	Tube cracked near tip, unknown debris observed on tip, unknown material on handle visible using ALS
3B	Yes	Unknown fiber-like particle and debris observed on camera tip, writing on plastic, liquid present in tube
4A	Yes	Unknown red-brown debris observed in handle mechanism and tip mechanism, unknown material on handle and wire neck visible using ALS
4B	Yes	Red-brown material observed on handle and scissor tip, unknown material on handle visible using ALS
5A	Yes	Unknown debris observed on tip, unknown material visible on handle using ALS

Table 2.

Item	Foreign material present	Comments
1A	Yes	Red-brown material on plastic port, camera tip and tubing appears cracked and cloudy
1B	Yes	Unknown material observed on plastic handle, unknown material on coiled portion of bent metal shaft visible using ALS
1C	Yes	Unknown material and fiber-like particle observed on plastic handle, red-brown material on coiled portion of bent metal shaft, unknown fiber-like particle observed on grasper end
1D	Yes	Unknown material and red-brown material observed on plastic handle and on grasper end
1E	Yes	Unknown red-brown material observed on scissor handle and on grasper end
2A	Yes	Unknown material and fiber-like particles observed on scissor handle, yellow-orange debris observed in scissor tip, tip would not open, unknown material observed on coiled shaft
2B	Yes	Unknown blue-green and red-brown material observed on plastic handle, unknown red-brown material and unknown fiber-like material observed on grasper end
3A	Yes	Unknown material on black attachment on scissor handle and grasper end

3B	Yes	Red-brown material observed on plastic port area, unknown material observed at tip-tube connection and inside tube, fiber-like particle observed on tube
3C	Yes	Brown-black material observed on plastic port area, unknown blue material observed at tip-tube connection and inside tip, camera tip appears cracked and cloudy
3D	Yes	Red-brown material observed on plastic port area, unknown blue-green material observed at port-tube connection, unknown material observed on camera tip, camera tip appears cracked and cloudy
4A	Yes	Unknown material on plastic plug end and tube visible using ALS, unknown red-brown material observed on plastic port area, blue-green material observed in camera tip and at tip-tube connection, camera tip appears cracked and cloudy
5A	Yes	Unknown material observed on scissor handle and black attachment, unknown red-brown material and unknown fiber-like material observed on grasper end
6A	Yes	Unknown material observed on camera tip, tip-tube connection, and tube
6B	Yes	Unknown material observed on camera tip, tip-tube connection, and tube

Pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G)(v), I approve the above disclosure.

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Hannah Godschalk, M.S.

June 3, 2025

Date